

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL WISNEFSKI,

Plaintiff,

v.

MICKEY GROUP INC. and ALEX  
RABENS,

Defendants.

Case No. 1:23-cv-04984

District Judge Ellis

Magistrate Judge Kim

**REFILED JOINT MOTION TO STAY DISCOVERY**

The Parties, by and through their respective undersigned counsel, jointly move to stay the discovery schedule in this matter pending the outcome of their upcoming settlement conference.

In support of this motion, the Parties state as follows:

1. On May 29, 2024, the Court heard and ruled upon several discovery disputes submitted by the parties and set a revised fact discovery close date of July 31, 2024.

2. In addition to ruling on the parties' discovery disputes, the Court referred the matter to Magistrate Judge Kim for a settlement conference.

3. The settlement conference with Judge Kim is currently scheduled for August 29, 2024, which was the soonest date available based upon Judge Kim and the Parties' schedules.

4. To avoid the time and expense of depositions, which may negatively impact the parties' prospects of settlement, the parties respectfully request that the current discovery schedule be stayed pending the outcome of their August 29, 2024 settlement conference.

5. If the parties are unable to resolve the litigation by settlement, it is anticipated that oral discovery could be completed within 30 to 45 days thereafter.

WHEREFORE, the Plaintiff, Michael Wisnefski, and the Defendants, Mickey Group, Inc. and Alex Rabens, respectfully request that this honorable court stay the current discovery schedule pending the outcome of their upcoming settlement conference and grant such further relief as may be just and appropriate under the circumstances.

Respectfully submitted,

MICHAEL WISNEFSKI

/s/ Andrew J. Cunniff  
John D. Galarnyk, Esq.  
Andrew J. Cunniff, Esq.  
John A. Romanucci, Esq.  
GALARNYK & ASSOCIATES, LTD.  
55 West Monroe Street  
Suite 3600  
Chicago, IL 60603  
[john@galarnykltd.com](mailto:john@galarnykltd.com)  
[andrew@galarnykltd.com](mailto:andrew@galarnykltd.com)  
[johnr@galarnykltd.com](mailto:johnr@galarnykltd.com)  
*Attorneys for Plaintiff*

MICKEY GROUP INC. and ALEX  
RABENS

/s/ Benjamin S. Morrell  
Benjamin S. Morrell  
Elizabeth C. Wellhausen  
TAFT STETTINIUS & HOLLISTER LLP  
111 E. Wacker Drive, Suite 2600  
Chicago, IL 60601  
312-527-4000  
[bmorrell@taftlaw.com](mailto:bmorrell@taftlaw.com)  
[ewellhausen@taftlaw.com](mailto:ewellhausen@taftlaw.com)

*Counsel for Defendants*